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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load

(TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0278

Anonymous public comment

Submitter Information

General Comment

The model used to establish the TMDL has three significant flaws: (1) data used for existing impervious surfaces is overstated by a 2.5 magnitude; (2) the model inadequately counts reductions currently being realized from common pollution reduction practices in Virginia; and (3) the model incorrectly accounts for pollutants from different land uses. It is arbitrary and illegal for EPA to establish a TMDL for the Chesapeake Bay until such time as the model is fixed.

Basing regulations while knowingly using flawed data is not in the best interest of the Citizens or the Environment.